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January 28, 2002

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By Hand

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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JAN 28 2002
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Revision of Part 15 of the Commission's Rules Regarding
Ultra-Wideband Transmission Systems
ET Docket No. 98-153
Ex Parte Communication**

Dear Ms. Salas:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of the Short Range Automotive Radar Frequency Allocation group ("SARA"), an association of automotive and automobile component manufacturers, to notify you of *ex parte* communications made to Bryan Tramont, Senior Legal Advisor to Commissioner Abernathy, and Monica Desai, Legal Advisor to Commissioner Martin, that occurred on Friday, January 25, 2002, concerning issues related to the above-referenced proceeding.

The *ex parte* communications were made to address the use of 24 GHz ultra-wideband ("UWB") radar systems designed to enhance road safety. In the communications, we discussed the need for the manufacturers involved in SARA to operate in a manner that allows intentional emissions into the frequency band, 23.6-24.0 GHz, which is currently a restricted band pursuant to Section 15.205 of the Commission's rules. I made the following points in the communications:

- 1) no party has raised any concerns on the record of this proceeding regarding the potential for harmful interference due to the operation of UWB automotive radar devices around a center frequency of 24.125 GHz.
- 2) UWB operations around a center frequency of 24.125 GHz is essential to the viability of the automotive radar systems currently under development by members of SARA.

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- 3) Low cost is key to the viability of UWB automotive radars and the likelihood that they will be made available on vehicles other than luxury, high-end automobiles. Moving up the center frequency of these devices beyond 24.125 GHz to avoid intentional emissions into the 23.6-24.0 GHz band would, at a minimum, double the cost of the devices because mass produced component parts that currently operate in the range of 24.125 GHz would not be available to operate at the higher frequencies.
- 4) Moving up to the center frequency beyond 24.125 GHz would add at least 3-5 years to the delay associated with rolling out the road safety applications.
- 5) Moving the center frequency of SARA's UWB devices above 24.125 GHz would be inconsistent with SARA's current plans seeking a harmonized global spectrum allocation.
- 6) Operating at reduced power levels in the 24 GHz range would severely reduce the measuring range of the devices, making object detection far less reliable.

An original and one copy of this letter is submitted for inclusion in the proceeding record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ari Q. Fitzgerald', with a large, sweeping flourish extending to the left.

Ari Q. Fitzgerald
Counsel for SARA

cc: Mr. Bryan Tramont
Ms. Monica Desai
Mr. Julius Knapp